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This request is granted. Plaintiffs' opposition to Defendant's motion for summary judgment shall be filed by March 28, 2024, and Defendant's reply, if any, shall be filed by May 13, 2024.

March 12, 2024

VIA ECF

The Honorable John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street, Room 1320
New York, NY 10007

SO ORDERED.
Date: March 13, 2024
New York, New York


JOHN P. CRONAN
United States District Judge

**Re: *Reclaim the Records and Alec Ferretti v. United States Department of State,*
No. 23 Civ. 1650 (JPC)**

Your Honor:

I am Of Counsel to Beldock Levine & Hoffman LLP, representing Plaintiffs in the above-referenced action brought pursuant to the Freedom of Information Act ("FOIA"). On behalf of Plaintiffs, I write to respectfully request a 14-day extension of the March 14, 2024 deadline for Plaintiffs' response to Defendant's motion for summary judgment. Under the revised briefing schedule, Plaintiffs' opposition brief would be due March 28, 2024 and Defendant's reply, if any, would be due on May 13, 2024. Defendant consents to this request.

This is the first request by Plaintiffs for an extension of the briefing schedule. I was only recently brought into the case after the departures of the two associates previously handling this matter at the end of December, and respectfully request this short extension to adequately consult with the Plaintiffs and finalize an appropriate response to Defendant's motion papers.

We thank the Court for its attention to this matter.

BELDOCK LEVINE & HOFFMAN LLP

Hon. John P. Cronan

March 12, 2024

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Respectfully submitted,


Benjamin Meyers

cc: Defendant's counsel (by ECF)